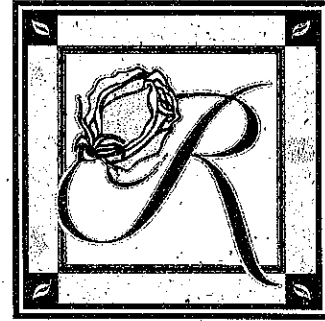


# THE ROSE FOUNDATION

For Communities & The Environment



4/29/95

Mr. Tom Torlakson, Chair  
Delta Protection Commission  
14219 River Rd.  
Box 530  
Walnut Grove, CA 95690

Re: Beneficial Uses of Biosolids from Sewage Sludge

Dear Mr. Torlakson,

I urge the Delta Protection Commission to reconsider its recent decision to issue a ban on the agronomic use of biosolids which fully meet EPA standards<sup>1</sup> within the Sacramento-San Joaquin Delta region. Land application of biosolids is a tested beneficial use<sup>2</sup> and presents an important opportunity for local governments to save money by turning a waste product into a valuable agricultural commodity.

Before embarking on biosolid reuse programs, many communities have concerns about the potential presence of toxic metals or other contaminants in the biosolids. In addition to crafting a strict monitoring program to ensure observance of EPA standards related to biosolid application, we urge you to encourage the municipalities which are generating the sludge to place their highest priority on enforcing industrial pretreatment regulations. Pretreatment regulations require dischargers to treat industrial wastewater before it enters the sanitary sewer, and helps prevent toxic metals and other contaminants from entering the sewage systems in the first place.

Over the last few years, a broad debate has been waged about traditional "command & control" style environmental regulations vs. the advent of a "market incentive" approach to controlling pollution. In other words - the

---

<sup>1</sup>The Federal EPA's Section 503 regulations outline allowable metal and other pollution content in biosolids, and constitute the strictest regulatory yardstick available to date for regulating agricultural use of such sewage byproducts.

<sup>2</sup>For example, the City of Los Angeles has years of experience in the use of biosolids as soil amendment in several programs.

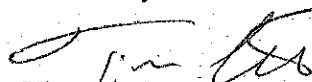
carrot vs. the stick. While the Rose Foundation supports the strictest enforcement of environmental standards which have been designed to protect both the public health and California's magnificent natural resources, we also believe that economic incentives to reduce pollution must be part of society's overall solution.

Agricultural use of biosolids can present distinct economic advantages, including free fertilizer for farmers, reducing pressure on overcrowded landfills, potential improvements in groundwater quality<sup>3</sup>, and incentives for aggressive pretreatment programs - which, in turn, lower the operating costs of sewage treatment plants.

In short, controlled agricultural application of biosolids benefits both the environment and the economy, and represents the kind of cost-effective solutions which will continue to maintain both California's competitive business edge and unique environmental quality.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Tim Little', with a long, sweeping horizontal line extending to the right.

Tim Little, Executive Director

---

<sup>3</sup>In many cases, biosolids actually have less soluble heavy metals than the chemical fertilizers they replace.